DAVIS & BUJOLD, PLLC

REMARKS

The Applicant would like to thank Examiner Stork for the detailed analysis contained in the Examination Report.

Claims 101, 111 and 122 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for the reasons noted in the official action. The rejected claims are accordingly amended, by the above claim amendments, and the presently pending claims are now believed to particularly point out and distinctly claim the subject matter regarded as the invention, thereby overcoming all of the raised 35 U.S.C. § 112, second paragraph, rejections.

The Applicant thanks the Examiner for noting claims 101, 111, and 122 lack a proper antecedent basis. This objection has been addressed, as these claims were cancelled in response to the objection under 35 U.S.C. § 101.

The Applicant thanks the Examiner for noting claims, which were rendered indefinite by clerical errors. This raised objections have been addressed by:

- amending Claim 98 to specify "a method of linking web pages";
- cancelling Claims 99 and 134.

Claims 99-134 have been rejected under 35 U.S.C. 101 as being directed to non-statutory subject matter. The Applicant has responded to this objection by cancelling claims 99-134 from the present application. In view of such cancellation, the Applicant will focus the following arguments upon the method claims.

Claims 70, 73, 76, 99, 102, 105, 126-127, 131 and 135 are rejected, under 35 U.S.C. § 102, as being anticipated by Consulting.com, Inc. while claims 71-72, 75, 78, 83-86, 88-89, 91, 100-101, 104, 107, 112-115, 117-118, 120, 128, and 136 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Consulting.com. The Applicant acknowledges and respectfully traverses all of the raised rejections in view of the following remarks.

The Applicant has reviewed the Consulting.com reference and is fully satisfied that the invention has not been disclosed in that reference. In citing this reference, the Examiner has

exposed possible shortcomings in the wording of the Claims. The Applicant, therefore, thanks the Examiner for the thoroughness of the analysis.

Every existing link has an anchor tag, which is visible on the screen. In order to be visible on the screen, these anchor tags take up space. Therefore, there are physical limitations on the number of links that can be placed on a web page, without disrupting the flow of the text. By following the methods disclosed by the Applicant, a web page can be provided with thousands of links. This is accomplished by having a category of links, which the Applicant has referred to as supplementary links. They are hidden or invisible links, in which the anchor tags do not become active or even become visible until a command is given. They are completely separate from any visible links.

The Consulting.com website had a drop down menu. The gateway to that drop down menu was provided by a visible anchor tag at "Demo". By clicking on that gateway, a lower level of menu, which formerly was not visible became visible. The Examiner's logic, as understood by the Applicant, is that the lower levels of the menu constitute "hidden links". The problem with this analysis is that the gateway to the drop down menu at "Demo" is always visible and the gateway would always be active, whereas the supplementary links envisaged by the Applicant would not be visible or active until a command is given to make them visible. If one attempted to place thousands of menu gateways, as taught by Consulting.com, on a web page, the shear volume of them would disrupt the flow of the text on the web page.

The Musciano et al. reference at 13.2.4.2 has a description entitled "The Hidden Attributes". An example is given of embedding an audio object onto a page. The audio object is "hidden". The browser does not show anything to the user, but rather plays background music for the page. These "hidden attributes" occur automatically, they are not user controlled. It is to be noted that the Musciano et al. reference teaches that a visible interface in the form of "an audio control panel" must be provided if the additional aspect of user control is to be introduced. With supplementary links that are invisible, space considerations are no longer an issue. If desired, a one to one relationship can be created between supplementary links and

pixels or points between pixels on the web page (as currently claimed in claim 137). However, the Applicant points out that according to the claims of the current application, multiple supplementary links may be linked to each pixel or point between pixels on the web page (as described on page 6 between lines 24 and 30 and recited in claim 138). More importantly, upon a user command, these supplemental links become visible for the user to access and use.

The Applicant acknowledges that the additional references of Microsoft Excel 2000, Kennedy, Yahoo, and/or Geilfuss, Jr. may arguable related to the features indicated by the Examiner in the official action. Nevertheless, the Applicant respectfully submits that the combination of the base references of Consulting.com and/or Musciano et al. with this additional art still fails to in any way teach, suggest or disclose the above distinguishing features of the presently claimed invention. As such, all of the raised rejections should be withdrawn at this time in view of the above amendments and remarks.

Each of the Independent claims in this application have been amended to distinguish over the cited references. The claims specify that the supplementary links are normally hidden and that a user initiated command is provided by which the at least one supplementary link becomes visible and accessible to the user. The claims further specify that the supplementary links are independent of any menu accessible through links visible to the user on the primary web page. It is respectfully submitted that the Consulting.com reference is simply a visible link, which has a hierarchical menu structure. The Applicant never intended to lay claim to this type of structure as a supplementary link. The claim amendment makes this clear. It is respectfully submitted that although the Musciano et al. reference discusses "hidden" attributes, these hidden attributes are embedded in the document such that they occur automatically. The currently claimed application differs from this reference in that Musciano et al. fails to provide a way to make these "hidden" features visible so that a user can select them. The Applicant is making links hidden. It was previously considered essential in the prior art that these type of links be visible, so that they could be selected. This position appears to be supported by the

references the Examiner has cited. The Applicant has added a user command, so that these hidden links can be made visible upon command so the user can select them.

If any further amendment to this application is believed necessary to advance prosecution and place this case in allowable form, the Examiner is courteously solicited to contact the undersigned representative of the Applicant to discuss the same.

In view of the foregoing amendments and arguments, it is respectfully submitted that the present application is now in a condition for allowance. The Applicant, therefore, requests the early issue of a Notice of Allowance.

In the event that there are any fee deficiencies or additional fees are payable, please charge the same or credit any overpayment to our Deposit Account (Account No. 04-0213).

Respectfully submitted,

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